

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

IN RE:

ATLAS ACQUISITIONS LLC, *et al*

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MISC CASE NO. 16-302  
(JUDGE ISGUR)

**NOTICE OF DEFICIENT APRIL 15<sup>TH</sup> DOCUMENT PRODUCTION OF JOEL TUCKER**  
**(Relates to Dkt # 35 & 40)**

**TO THE HONORABLE MARVIN ISGUR,  
UNITED STATES BANKRUPTCY JUDGE:**

1. On April 4, 2016, this Court approved an Order of Temporary Release (“the April 4<sup>th</sup> Order”), which conditioned Joel Tucker’s release from jail on, among other things, Mr. Tucker’s production of documents on a rolling basis.

2. The first deadline for Mr. Tucker to produce documents under the April 4<sup>th</sup> Order was 4 p.m. on Friday, April 8, 2016. By that time, the Order commanded Mr. Tucker to produce “copies of all emails, e-mail attachments, text messages and other electronic communications directly or indirectly related to the \$390.00 alleged ‘Castle Peak’ claims” (“the April 8<sup>th</sup> production”).

3. Mr. Tucker’s deficient April 8<sup>th</sup> production is described in the Notice of Deficient April 8<sup>th</sup> Document Production of Joel Tucker (Dkt #40).

4. The second deadline for Mr. Tucker to produce documents under the Court’s April 4<sup>th</sup> Order was 4 p.m. on Friday, April 15, 2016. By that time, the Order commanded Mr. Tucker to produce “copies of all electronic and paper records located in Colorado and directly or indirectly related to the \$390.00 alleged ‘Castle Peak’ claims” (“the April 15<sup>th</sup> production”).

5. Mr. Tucker's April 15<sup>th</sup> production constituted one page that included banking and related information for five persons who are listed in the Court's Show Cause Order of February 5, 2016 (Dkt # 1) as being debtors of \$390 claims. Mr. Tucker's counsel stated that the one page "represents the responsive documents that were located through the search that was conducted of the electronic server in Colorado and the paper files in Colorado. This does not include [Mr. Tucker's] search of relevant emails." No explanation was provided as to why the production did not include a search of relevant emails, which are clearly required by the Court's April 4<sup>th</sup> Order.

6. Although two document production deadlines have passed, Mr. Tucker still has not provided any of the following information:

- Copies of emails and related documents relating to Mr. Tucker's extensive email communications with Jeffrey Brooks of First Source Data, LLC regarding the negotiation and sale of the \$390 claims to Porania, LLC; and
- Copies of any emails, attachments, documents and other electronic communications between Mr. Tucker and the persons or entities who own the \$390 claims or from whom he acquired the \$390 claims.

Respectfully submitted:

/s/ Tom Kirkendall

Tom Kirkendall

State Bar No. 11517300/SDTX No. 02287

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**AND JEFFREY DUNN**

**CERTIFICATE OF SERVICE**

The undersigned certifies that, on April 18<sup>th</sup>, 2016, a true and correct copy of the foregoing notice was served upon the following parties-in-interest via email and through the ECF system:

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